

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

iFLY HOLDINGS LLC,

Plaintiff,

v.

INDOOR SKYDIVING GERMANY GMBH,

Defendant.

CIVIL ACTION NO. 2:14-CV-01080-JRG-RSP

AFFIDAVIT OF JASON PETERS
IN SUPPORT OF INDOOR SKYDIVING GERMANY GMBH'S
MOTION TO DISMISS AND/OR TRANSFER

I, Jason Peters, declare as follows:

1. I am one of the founders of the Phoenix project. I submit this affidavit in support of Indoor Skydiving Germany GmbH's ("ISG") motion to dismiss for lack of personal jurisdiction and/or motion to transfer venue. Unless otherwise indicated, I have personal knowledge of the facts set forth in this affidavit and, if called as a witness, could and would competently testify to them.
2. I am a professional skydiver and an Arizona resident. I live and work in Eloy, Arizona.
3. In early 2012, Gary Schmit and I decided to pursue the possibility of developing an indoor skydiving simulator in Phoenix, Arizona. For most of the year, we worked on the project and put together a business plan.
4. On September 20, 2012, I sent Boris Nebe a Facebook message from Arizona asking him about the possibility of helping us build an indoor skydiving wind tunnel in Phoenix, Arizona. I received a non-disclosure agreement from Mr. Nebe to engage in further discussions. I was in Arizona during this communication and document exchange.
5. In July 2013, Gary Schmit and I traveled to Oshkosh, Wisconsin to attend an air show and to meet with a possible investor for our wind tunnel project. While at the air show, a mutual friend introduced us to Max Reising. We discussed the possibility of Reising investing in the indoor skydiving simulator in Phoenix, Arizona.
6. After our meeting in Wisconsin, we continued to have multiple telephonic discussions and a few in-person meetings, primarily in Arizona, in furtherance of developing the project. Later in the year, I shared our business idea with another professional skydiver, Andy Malchiodi, who lives and works in Lake Elsinore, California.
7. During this time, Schmit and I began looking for a suitable location for the indoor skydiving simulator around the Phoenix area. The only locations we considered were near Phoenix. We ultimately settled on a lot in Scottsdale, Arizona, which is owned by the Salt River Pima-Maricopa Indian Community.

8. In January 2014, I requested and received a proposal from ISG for construction of a vertical wind tunnel near Phoenix, Arizona. Up to this point, we had only discussed the terms of a potential agreement with ISG, but no agreement had been reached.
9. Gary Schmit, Andy Malchiodi, Max Reising and I formed a limited partnership, FliteShop Phoenix LP, for the purpose of funding and developing a skydiving simulator to be built in Phoenix, Arizona. Reising handled the formalization of this partnership.
10. On January 7, 2014, I traveled to Germany to meet with ISG. Schmit, Malchiodi, and Reising flew to Germany the following day. Together we met with ISG at its offices in Gladbeck, Germany to negotiate the terms of a potential future sale. We reached an agreement that allowed, but did not require FliteShop Phoenix LP to buy an ISG wind tunnel for the Arizona project. The agreement simply gave us the option of ordering an ISG wind tunnel in the future. To date, no formal order has been placed.
11. If the wind tunnel project is built, the current plan is that I will be in charge of the day-to-day operations of the facility.
12. Because I live in Eloy, Arizona, it is much more convenient for me to attend deposition and trial in Phoenix Arizona. I do not regularly travel to East Texas and have never been to Marshall, Texas. It would incur substantial expense, lost time at work, and other personal inconveniences if I had to travel to East Texas for trial. Any relevant documents concerning the wind tunnel project would be located in my home office in Eloy, Arizona.

I do solemnly declare and affirm that under the penalties of perjury of the laws of the United States of America that the contents of this affidavit are true to the best of my knowledge, information, and belief. Executed this 25 day of March, 2015.



Jason Peters